

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANNA PATRICK, ET AL., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

DAVID L. RAMSEY, III, individually; HAPPY
HOUR MEDIA GROUP, LLC, a Washington
limited liability company; THE LAMPO
GROUP, LLC, a Tennessee limited liability
company,

Defendants.

Case No.: 2:23-cv-00630 JLR

**DECLARATION OF JACK M.
LOVEJOY IN SUPPORT OF
DEFENDANT HAPPY HOUR MEDIA
GROUP, LLC'S MOTION TO DISMISS
THE COMPLAINT**

**NOTED ON MOTION CALENDAR:
October 27, 2023**

Jack M. Lovejoy states and declares as follows:

1. I am an attorney at Corr Cronin LLP, attorneys of record for Defendant Happy Hour Media Group, LLC in the above-captioned matter. I am over eighteen years of age, competent to testify and submit this declaration based upon personal knowledge in support of Happy Hour Media Group, LLC's Motion to Dismiss.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Complaint filed in *State of Washington v. Reed Hein & Associates, LLC, et al.*, King County Superior Court Case No. 20-2-03141-1 SEA.

1 3. Attached hereto as **Exhibits 1, 23, 24, 24-1, 25, 26, 27, 38, 43, 44, 44-1, and 45**
2 are true and correct copies of docket entries from *Adolph v. Reed Hein & Associates et al.*,
3 United States District Court, Western District of Washington, Case No. 2:21-cv-01378-BJR.
4 Each exhibit is numbered with its corresponding number on the docket of the *Adolph* lawsuit.
5 For example, Exhibit 1 is Dkt. 1, Exhibit 23 is Dkt. 23, and so on.

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7 I declare under penalty of perjury that the foregoing is true.

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9 DATED this 5th day of October, 2023 at Seattle, Washington.

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11 s/ Jack M. Lovejoy
12 Jack M. Lovejoy, WSBA No. 36962
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CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2023, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ Wen Cruz
Wen Cruz